

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE: THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,
As representative of THE COMMONWEALTH
OF PUERTO RICO, ET AL.

Debtors

Case No. 17-BK-3283 (LTS)

(Jointly Administered)
PROMESA TITLE III

OPPOSITION TO OBJECTION TO CLAIM

TO THE HONORABLE COURT:

COMES NOW, FIDEICOMISO HERNÁNDEZ CASTRODAD (FHC) through the undersigned attorney and hereby enters its appearance and respectfully states and prays as follows:

1. On December 16, 2022, as part of the Five Hundred Fifty-Third Omnibus Objection, (Doc#:23089), Debtor partly objected the claim number 263 filed on 11/01/2017 originally filed by FHC in the amount of \$39,200.00, arguing that as per the books and records of the Commonwealth, \$14,700.00 were paid, and that the balance of \$24,500.00 was not sufficiently supported by the documentation filed with the claim.

2. FHC's right to the payment of the rents claimed interest had been perfected since 06/01/2017 based on the Lease Agreement signed by Debtor on September 5th, 2014, as per Department of the Family contract number 2012-000229, and registered in the Puerto Rico Comptroller's Office under contract number 122-2012-000229. **See Exhibit 1 - Copy of Lease Agreement filed with Claim 263.**

3. In fact, the amount of \$14,700.00 that Debtor has paid on the claim 263 corresponds to the post-petition portion of the claim, and the amount that Debtor argues is not supported by sufficient documentation corresponds to the prepetition portion of the claim which amounts to \$24,500.00. **See Exhibit 2 – Copy of the Statement of Account filed with Claim 263.**

4. Debtor has ample documentation and knowledge of the contract and the total amount due, since it paid the post-petition amount, whose supporting documents are the same needed to support the pre-petition amount due of \$24,500.00.

WHEREFORE, it is respectfully prayed that this Honorable Court grant the Claim Number 236 and deny Debtor's objection to Claim Number 263.

I HEREBY CERTIFY: That on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notice of this filing to all parties in interest as per master address list.

In San Juan, Puerto Rico, this 17th day of January, 2023.

/s/ Rosendo E. Miranda López,
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